

## UNITED STATES DISTRICT COURT

for the  
Eastern District of Michigan

Case: 2:24-mc-50197-1

Assigned To : Berg, Terrence G.

Assign. Date : 3/1/2024

Description: RE: SEALED MATTER

Case No. (EOB)

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)a parcel bearing USPS Priority Mail label number 9505  
5148 5621 4059 5895 46 (more fully described in the  
affidavit and Attachment A)

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

See ATTACHMENT A.

located in the \_\_\_\_\_ Eastern \_\_\_\_\_ District of \_\_\_\_\_ Michigan \_\_\_\_\_, there is now concealed *(identify the person or describe the property to be seized)*:

See ATTACHMENT B.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Offense Description

21 U.S.C. §§ 841(a)(1) and 846

Possession with intent to distribute controlled substances and conspiracy.

The application is based on these facts:

See attached AFFIDAVIT.

- ☒ Continued on the attached sheet.  
☐ Delayed notice \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

  
 Applicant's signature


Daryl K. Reitzner, Postal Inspector (USPIS)

Printed name and title

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: March 1, 2024

City and state: Detroit, Michigan

  
 Judge's signature

Hon. David R. Grand, U. S. Magistrate Judge

Printed name and title

**AFFIDAVIT**

I, Daryl Reitzner, being duly sworn on oath, state as follows:

1. I am a United States Postal Inspector assigned to the Allen Park Domicile of the Detroit Division of the U.S. Postal Inspection Service (USPIS). I am sworn and empowered to investigate criminal activity involving or relating to the U.S. Postal Service. Currently, I am assigned to investigate the unlawful transportation of contraband, including those covered under Title 21 USC: Controlled Substances, through the United States Mail. I have been a Postal Inspector since August 2021 when I attended the United States Postal Inspection Service Basic Training Academy in Potomac, MD. There, in addition to training in threat management, basic criminal investigation, and other related fields, I received training in the detection and investigation of prohibited mailing offenses. As part of my duties, I investigate incidents wherein the United States mail system is used for the purpose of transporting non-mailable matter, including controlled substances such as marijuana, cocaine, methamphetamine, fentanyl, and heroin, in violation of Title 21, United States Code, Sections 841(a)(1), 846, 843(b), and substances mailed in violation of Title 18, United States Code, Section 1716. Prior to my employment with the USPIS, I was a commissioned police officer with the City of University City Police

Department (UCPD) from June 2009 until August 2021. While employed with UCPD, I was a Patrol officer for eight years and a Field Training officer for four years. During my tenure with UCPD, I was tasked with investigating drug violations, crimes against property and crimes against person(s). Because this affidavit is submitted for the limited purpose of establishing probable cause in support of a Search Warrant, it does not set forth every fact that I or others have learned during the course of this investigation.

#### AFFIDAVIT SUMMARY

2. The United States Postal Inspection Service seeks a warrant to search the contents of a parcel sent from Whittier, CA to Lincoln Park, MI that was removed from the United States Mail stream because of certain suspicious characteristics, and a positive alert by a narcotic detecting canine. It is believed to contain controlled substances or proceeds of illegal narcotics activity.

3. This affidavit is made in support of an application for a search warrant on a large 16x16x12 brown Scotch cardboard box bearing USPS Priority Mail Label Number 9505 5148 5621 4059 5895 46, addressed to “Jonathan Navarro, 1566 University Ave., Lincoln Park, MI 48146” in the addressee window with a listed return address of “Chelly Vaz, 4725 Bannister Ave., El

Monte, CA” in the return address window. The parcel was mailed on February 28, 2024 from the Whittier, CA 90606 Post Office, weighs approximately 12 pounds 14 ounces and bears \$88.50 in postage and fees. This parcel is hereafter referred to as the Subject Parcel.

4. Based on my training and experience, I am aware that the Priority Mail service was created as a less expensive alternative to Express Mail overnight delivery, but designed to provide quicker, more reliable service than standard First-Class Mail. Whereas a customer mailing an article via Express Mail expects next-day service, a customer who mails an article via Priority Mail can expect two-to-three-day delivery service. The USPS also provides a tracking service through a USPS tracking number, which allows the customer to track the parcel and confirm delivery.

5. From my training and experience, as well as the training and experience of other Postal Inspectors in the Prohibited Mailings Team, I am aware that the USPS mail system is frequently used to transport controlled substances and/or proceeds from the sale of controlled substances to areas throughout the United States. I also know that drug traffickers prefer mail/delivery services such as Express Mail and Priority Mail because of their reliability and the ability to track the article’s progress to the intended delivery point. When a drug trafficker learns that a mailed article has not

arrived as scheduled, he/she becomes suspicious of any delayed attempt to deliver the item.

6. Based on my training and experience regarding Priority Mail operations, I am aware that most Priority Mail mailings are business mailings. Businesses have found that Priority Mail is a significantly less expensive method of mailing than Express Mail, particularly when next-day service is not a requirement. I also know that like Express Mail, Priority Mail business mailings tend to be smaller, lighter mailings, and on average, weigh less than two pounds. Examples of the typical types of business mailings conducted via Priority Mail include books, clothing, pharmaceuticals, and consumer goods purchased from online retailers.

7. Based on my training and experience regarding the use of Express Mail and Priority Mail for the transportation of controlled substances or the proceeds from the sale of controlled substances, I know these types of mailings usually bear the following characteristics:

- a. The article is larger or heavier than the typical Express Mail or Priority Mail mailings, which usually weigh less than 8 ounces for Express Mail and less than two pounds for Priority Mail.
- b. The Express Mail and Priority Mail packages will have a handwritten label, unlike typical Express Mail and Priority Mail

business mailings, which usually have typed or computer-generated labels.

- c. The handwritten label on Express Mail and/or Priority Mail packages will not contain a business account number, thereby indicating the sender likely paid cash.
- d. The article either; (1) was destined for an area known to be a frequent destination point for controlled substances, and/or having been mailed from an area known to be a source area of controlled substances; (2) originated from an area known to be a frequent origination point for the proceeds from the sales of controlled substances, and/or having been mailed to an area known to be a destination area for the proceeds from the sales of controlled substances.
- e. The postage fees are paid for with cash, as opposed to by an individual using a credit card, to further obscure the identity of the sender.

Articles found to bear the characteristics described above are further scrutinized by Postal Inspectors.

8. Based on my training and experience, I know that drug traffickers will often use fictitious names or incomplete names and/or addresses to attempt

to conceal their identity from law enforcement. Additionally, drug traffickers may use the names of real individuals not associated with the return or destination addresses listed on the parcel in attempt to conceal their identity. Address verifications are also conducted as part of the investigation, and the sender or the recipient will regularly be found to not be associated with the addresses. As well, the return address listed on the articles is either fictitious, incomplete, or do not exist. In addition to address verifications, the articles are subject to trained narcotic-detecting canine examination.

9. In this case, a database used by the Postal Inspection Service that has proven to be reliable in connection with past investigations, revealed the listed return address of “4725 Bannister Ave., El Monte, CA 91732” is a legitimate address. Further, the same database showed the name “Chelly Vaz” does not associate with the address.

10. Using the same database, I learned that the listed addressee/recipient “Jonathan Navarro” is associated with the destination/delivery address of “1566 University Ave., Lincoln Park, MI 48146.”

11. On March 01, 2024, Postal Inspectors retrieved the Subject Parcel from a Postal facility in the Eastern District of Michigan. Affiant conducted a further inspection of the parcel which displayed several characteristics that

indicated it may contain a quantity of controlled substances or proceeds from the sale of controlled substances.

12. A review of the Subject Parcel revealed it met several characteristics described above including:

- the parcel being sent from a location that is a source area for controlled substances to an area that is a known destination for controlled substances,
- the parcel was paid for in cash,
- the parcel at 12 pounds 14 ounces weighs more than the 2 pound average,
- the parcel was sent from zip code 90606 which is approximately fourteen miles away or nineteen minutes away from the return address,
- the listed sender Chelly Vaz is not associated with the return address,
- the label is handwritten with no business account listed.

13. On March 01, 2024, Postal Inspectors met United States Border Patrol (USBP) Agent Ryan Sprague. Agent Sprague brought a narcotics canine named “Myko” to the USPIS Allen Park Domicile located in Allen Park, MI. According to Agent Sprague, Canine (K-9) Myko is a six-year-old



male German Shepherd, trained and certified in detecting Cocaine, Marijuana, Heroin, Ecstasy, Methamphetamine, as well as Fentanyl and its derivatives. K-9 Myko alerts to a controlled substance odor by laying down next to and staring at the source of these odors. K-9 Myko works daily with Agent Ryan Sprague of the USBP. K-9 Myko and Agent Sprague were both trained by the USBP. K-9 Myko and Agent Sprague received their annual recertification for narcotics detection with the USBP on July 31, 2023. K-9 Myko has performed hundreds of sniffs of suitcases, parcels, buildings, motor vehicles and other related areas during training. Based upon prior inspections, K-9 Myko's alert has been proven to be both accurate and reliable.

14. On March 01, 2024, at approximately 10:54 a.m., Postal Inspectors arranged a controlled substance detection test by placing the Subject Parcel in an area at the USPIS Allen Park Domicile with parcels similar in size and shape to the Subject Parcel not used in previous detection tests. Agent Sprague and Myko were not present when the parcels were placed for the controlled substance detection test.

15. During the controlled substance detection test, Postal Inspectors observed Myko examine the area and alert only on the Subject Parcel by laying down in front of the Subject Parcel. Agent Sprague advised Postal

Inspectors that this action indicated that controlled substances or items which had recently been in contact with controlled substances were likely contained in the Subject Parcel.

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16. Based on the above facts, Affiant has probable cause to believe there are controlled substances or proceeds from the sale of controlled substances are contained in the Subject Parcel, in violation of Title 21, Sections 841 (a)(1) and 846, and therefore respectfully requests a search warrant be issued for the Subject Parcel.

Respectfully Submitted,



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Daryl Reitzner  
Postal Inspector

Sworn to before me and signed in my presence  
and/or by reliable electronic means.



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Hon. David R. Grand  
United States Magistrate Judge

March 1, 2024

ATTACHMENT A

A large 16x16x12 brown Scotch cardboard box bearing USPS Priority Mail Label Number 9505 5148 5621 4059 5895 46, addressed to “Jonathan Navarro, 1566 University Ave., Lincoln Park, MI 48146” in the addressee window with a listed return address of “Chelly Vaz, 4725 Bannister Ave., El Monte, CA” in the return address window. The parcel was mailed on February 28, 2024 from the Whittier, CA 90606 Post Office, weighs approximately 12 pounds 14 ounces and bears \$88.50 in postage and fees.

ATTACHMENT B

A quantity of a Controlled Substance, in violation of Title 21, U.S.C., Sections 841(a)(1) and 846; or other items associated with drug trafficking, such as records, notes and correspondence, currency, and/or evidence tending to identify the source of the package and the intended recipient.

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Eastern District of Michigan

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(EOB)

Case No.

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(Briefly describe the property to be searched  
or identify the person by name and address)a parcel bearing USPS Priority Mail label number 9505  
5148 5621 4059 5895 46 (more fully described in the  
affidavit and Attachment A)

## SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search  
of the following person or property located in the Eastern District of Michigan.  
(identify the person or describe the property to be searched and give its location):

See ATTACHMENT A.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property  
described above, and that such search will reveal (identify the person or describe the property to be seized):See ATTACHMENT B, in violation of 21 U.S.C. §§ 841 (a)(1) and 846 - possession with intent to distribute controlled  
substances and conspiracy.**YOU ARE COMMANDED** to execute this warrant on or before March 15, 2024 (not to exceed 14 days)☒ in the daytime 6:00 a.m. to 10:00 p.m. ☐ at any time in the day or night because good cause has been established.Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the  
person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the  
property was taken.The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory  
as required by law and promptly return this warrant and inventory to the presiding United States Magistrate Judge on duty.  
(United States Magistrate Judge)☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C.  
§ 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose  
property, will be searched or seized (check the appropriate box)☐ for      days (not to exceed 30) ☐ until, the facts justifying, the later specific date of                                     .Date and time issued: March 1, 2024 3:49 pm  
Judge's signatureCity and state: Detroit, MichiganHon. David R. Grand, U. S. Magistrate Judge  
Printed name and title

**Return**

Case No.:

Date and time warrant executed:

Copy of warrant and inventory left with:

Inventory made in the presence of :

Inventory of the property taken and name of any person(s) seized:

**Certification**

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Executing officer's signature*\_\_\_\_\_  
*Printed name and title*